

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar Number 7709
ROBERT KNIEF
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Tel: (702) 388-6336
Robert.Knief@usdoj.gov
Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

IDRISS QIBAA,

Defendant.

Case No. 2:24-mj-00629-BNW

CRIMINAL COMPLAINT

COUNT ONE

18 U.S.C. § 875(c) – Interstate
Communications

BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned
Complainant, being first duly sworn, deposes and states:

COUNT ONE

Interstate Communications

On or about July 19, 2024, in the State and Federal District of Nevada and
elsewhere,

IDRISS QIBAA,

defendant herein, knowingly transmitted in interstate commerce from the State of Nevada
to the State of California, text message communications containing threats to injure and
kill T.C. and members of T.C.'s family, all in violation of Title 18, United States Code,
Section 875(c).

COUNT TWO

Interstate Communications

On or about July 24, 2024, in the State and Federal District of Nevada and elsewhere,

IDRISS QIBAA,

defendant herein, knowingly transmitted in interstate commerce from the State of Nevada to the State of California, text message communications containing threats to injure and kill M.B., all in violation of Title 18, United States Code, Section 875(c).

PROBABLE CAUSE AFFIDAVIT

Your Complainant, as a Special Agent with the Federal Bureau of Investigation, states the following as and for probable cause:

1. Your Complainant is a Special Agent with the Federal Bureau of Investigation (FBI), has been so employed since September 2021. As an FBI Special Agent, your Complainant is assigned to the FBI's Las Vegas Violent Crimes Task Force and is responsible for investigating a variety of violent crimes, to include: bank robbery, kidnapping, extortion, Hobbs Act robbery, carjacking, assaults and murders of federal officers, racketeering related violent offenses, as well as long-term investigations into the activities and operations of career criminals, criminal enterprises, drug trafficking organizations, and violent street gangs. Your Complainant has experience in conducting criminal investigations, including the investigation of criminal groups and conspiracies, as well as the collection of evidence and the identification and use of witnesses.

FACTS ESTABLISHING PROBABLE CAUSE

1 2. On April 1, 2024, The Federal Bureau of Investigation was made aware of an
2 extortion/threatening communications scheme being perpetrated by IDRIS QIBAA¹
3 (QIBAA) against victims located in Nevada, California, Washington, New York, and
4 Florida. QIBAA is known by pseudonyms to include “Dani” and “Unlocked.” QIBAA
5 maintains a presence on social media and his website, Unlocked4life.com, where he
6 advertises his services of being able to ban/unban social media accounts on Instagram,
7 SnapChat, Telegram, and TikTok. Unlocked4life.com is a website QIBAA operates that
8 has several posts of accounts QIBAA has been able to lock out in the past to include
9 @EmoneyEmpire, “Cali Plug,” “Skunk LA,” and “HARD_BODY_KID.”
10 Unlocked4life.com also offers a service where customers can purchase “TLO”² which
11 includes the personal identifying information of someone that can be posted online
12 (doxing). Unlocked4life.com had posted two examples of what was referred to as “TLO”
13 information that include names, addresses, Social Security account numbers, and dates of
14 birth of individuals. Accuracy of this information was validated using law enforcement
15 database Accurint/LexusNexus. Another service offered by Unlocked4life.com is the
16 ability to apply “scam” tags to any Telegram accounts. One example posted shows a
17 “scam”³ tag on the account “FREE SIGNALS.”

18 3. On January 18, 2024, QIBAA appeared on a podcast called “No Jumper”
19 hosted by “Adam22.” During this podcast, QIBAA outlined an extortion scheme he has
20 perpetrated against multiple victims. QIBAA stated he profits by locking victims out of

21 ¹ QIBAA is a Moroccan national who is in the United States legally but is not a citizen. On multiple occasions through
22 different means, QIBAA has stated if he feels any law enforcement pressure or is arrested and makes bail, he will flee
back to Morocco and “live like a king.”

23 ² TLO is an acronym for TransUnion Locator Services which is a skiptrace database. A skiptrace database collects
and stores information about individuals to help find their current location. TLO, now known as TransUnion TLOxp,
is widely used by law enforcement agencies, private investigators, and skiptracers.

³ A scam tag is a notation attached to an account indicating it may be being used to scam other people.

1 their social media accounts on Instagram and charges the victims to unlock the account.
2 QIBAA stated he has over 200 people who pay him monthly to maintain access to their
3 accounts claiming he makes more than \$600,000 a month. During the podcast, “Adam
4 22” stated, “Well it strikes me that the smart people no offense caliplug, but I feel like the
5 smart people would not admit that they’ve spent money on it because I- like I’ve talked to
6 stars who have told me that they’ve paid to get it back 20 times over and over and over
7 they just have to keep paying to get it back – and I’m like you realize what’s happening to
8 you right like the same person that’s getting you it back is” to which QIBAA responds,
9 “You’re getting extorted.”

10 VICTIM 1

11 4. J.T. is a self-employed social media influencer who utilizes platforms such as
12 Instagram. J.T.’s Instagram accounts “theblacklistxyz” and “Caliplug” reported primarily
13 on the cannabis industry and had approximately 500,000 followers. J.T. was highly
14 dependent on these Instagram accounts for income and success in his businesses.

15 5. J.T. was introduced to “Dani” who he later learned to be QIBAA. QIBAA
16 had an Instagram account called “Unlocked4life,” which advertised services to include
17 blocking/unlocking social media accounts as well as being able to procure social media
18 handles that had been restricted. J.T. asked QIBAA for a quote to obtain a username.
19 QIBAA quoted J.T. a price of between \$4,000 and \$5,000. J.T. declined QIBAA’s
20 services.

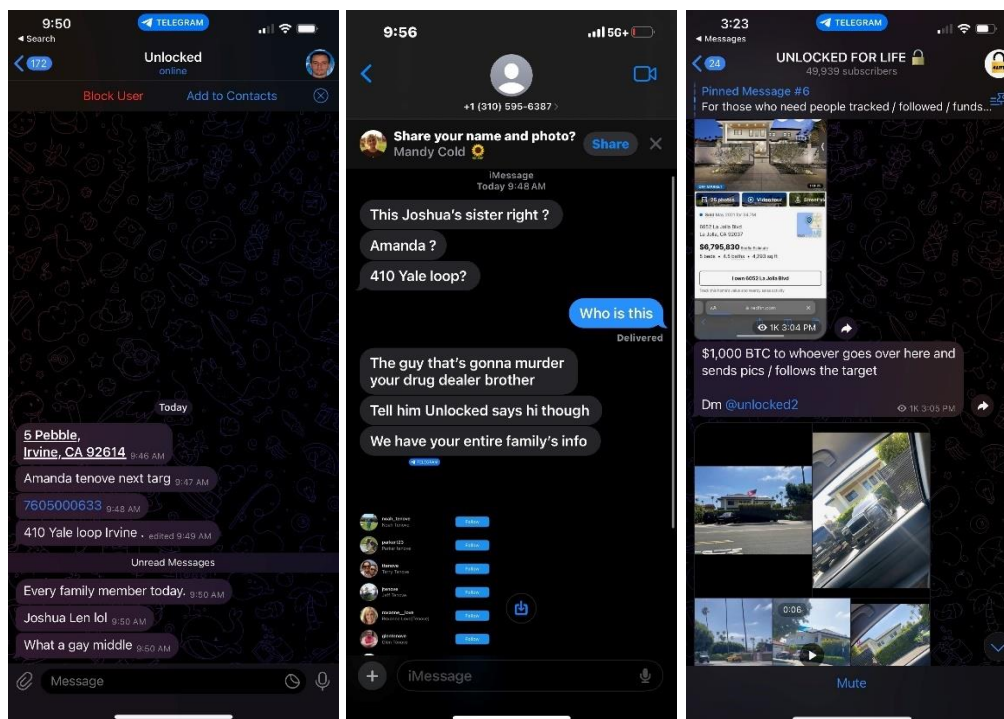
21 6. When J.T. did not purchase the username, QIBAA took offense and began
22 to threaten J.T. QIBAA told J.T. that J.T. had wasted QIBAA’s time, blocked J.T.’s
23 Instagram pages, and demanded \$10,000 to reinstate it. J.T. offered QIBAA \$8,500 to
reinstate the account. An offer QIBAA accepted. J.T. paid the \$8500 in cash and J.T.’s

Instagram account was reinstated. J.T. attempted to maintain a civil relationship with QIBAA.

7. On or about August 2023, QIBAA asked J.T. if J.T. would promote QIBAA's Instagram page. J.T. agreed without realizing QIBAA was extorting and threatening customers QIBAA came in contact with. J.T. confronted QIBAA once customers made J.T. aware of QIBAA's activities. QIBAA was irate with J.T.

8. In December 2023, QIBAA called J.T. and threatened to destroy him and his family. QIBAA threatened to call J.T.'s ex-wife's lawyer and CPS on his children. QIBAA told J.T. he was extorting him for \$10,000. J.T. then cut off all communication with QIBAA.

Messages J.T. and family received from QIBAA



1 9. A.T. was a San Diego based businessman who came to know QIBAA in
2 approximately April 2024. A.T. paid \$25,000 to purchase the rights to an Instagram
3 handle “@ace” from QIBAA. A.T. never received the rights or his money back. After the
4 failed transaction between A.T. and QIBAA, A.T. attempted to pay QIBAA \$10,000 to
5 leave A.T. alone. QIBAA refused and demanded \$100,000 instead. A.T. ceased all contact
6 with QIBAA at that point.

7 10. A.T. started to receive threatening communications from 424-977-1439⁴ as
8 frequent as every other day. The caller made threats to shoot or injure A.T.’s daughter,
9 fiancé, dog, business partners and their families.

10 VICTIM 3

11 11. E.H. was a journalist and comedian who previously worked for a widely
12 known entertainer. E.H. operated an Instagram account called @*****post⁵ and had
13 approximately 195,000 followers. That site was blocked. E.H. was contacted by E.C.
14 who informed E.H. that a dentist in California who had previously treated the widely
15 known entertainer was the person who hired “Unlocked4Life” to target E.H.’s Instagram
16 account. E.C. provided E.H. with screenshots of messages between them. The messages
17 start by saying “Yo its Idriss.”

18 12. E.H. was later contacted by “Unlocked” from cellular number 424-359-9722⁶
19 which told her to search “Unlocked no jumper” on Youtube to prove who he was. E.H.
20 received more than 2,000 SMS messages to spam her phone. “Unlocked” told E.H. he had
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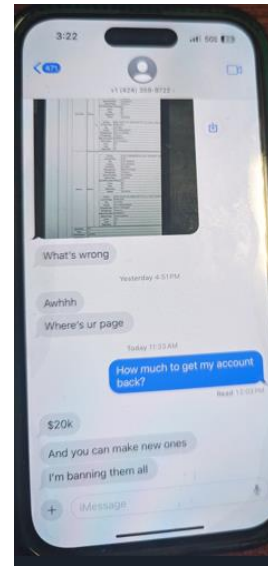
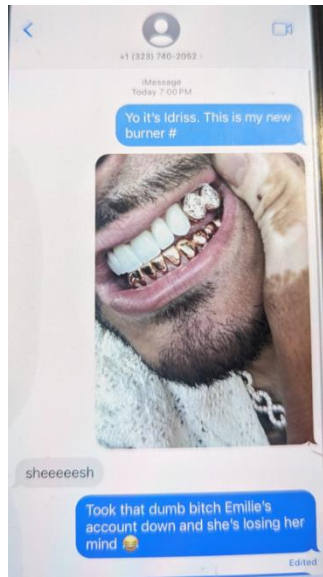
22
23 ⁴ This number has no identifiable subscriber.

⁵ The first name of the entertainer is withheld for privacy considerations.

⁶ This number is for a prepaid phone with no listed subscriber.

her Social Security account number and would “blast it out.” “Unlocked” also told E.H. she needed to pay \$20,000 to get her Instagram account back and stop being attacked.

Messages E.H. and E.C. and family received from QIBAA



VICTIM 4

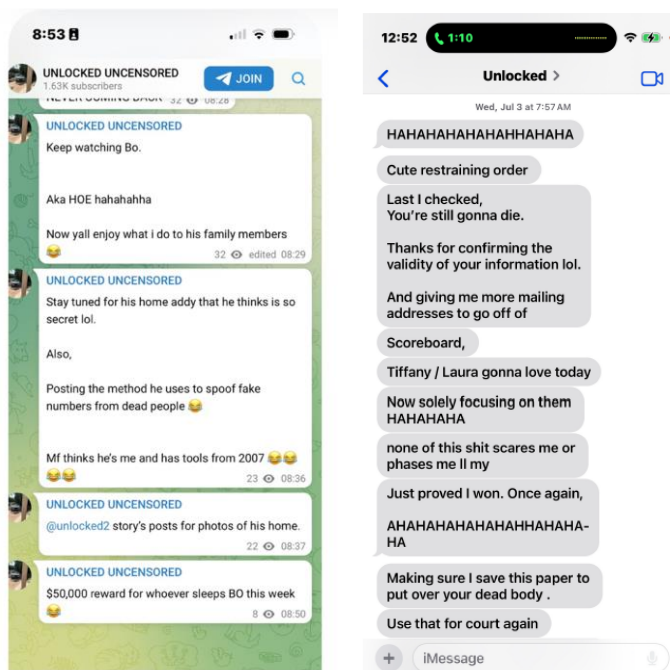
13. R.B. operated an Instagram account “@OutlawArchive” which was disabled for unknown reasons. An unknown user on Telegram messaged R.B. and instructed him to contact “IDRISS QIBAA” to inquire about recovering his account. R.B. contacted QIBAA and QIBAA advised R.B. it would cost approximately \$12,000 to recover the account.

14. On May 30, 2023, R.B. and QIBAA were scheduled to have dinner to discuss recovering his R.B.’s account. R.B. cancelled the dinner which upset QIBAA. QIBAA sent several threatening communications to R.B. to include “you’ll learn..and not done w u just been busy.” On June 1, 2024, QIBAA sent R.B. a .pdf file which contained

R.B.'s personal identifying information to include his Social Security account number, current address, past addresses, and stated, "posting now."

15. Special Agent Ian Wendelboth searched Unlocked4life.com and identified a document (TLO) that included the personal identifying information that was reported by R.B. This document included R.B.'s Social Security account number, date of birth, phone numbers and several known addresses.

16. R.B. filed and was granted a restraining order against QIBAA in Los Angeles County Superior Court. In July 2024, QIBAA was made aware of the order and contacted R.B. QIBAA sent threatening texts from 424-359-9722 to include "Cute restraining order.. last I checked you're still gonna die." On the Telegram account "UNLOCKED UNCENSORED" a post stated, "\$50,000 reward for whoever sleeps BO this week."⁷



⁷ BO is a nickname for R.B. and "sleeps" is slang for kill.

VICTIM'S 5 and 6

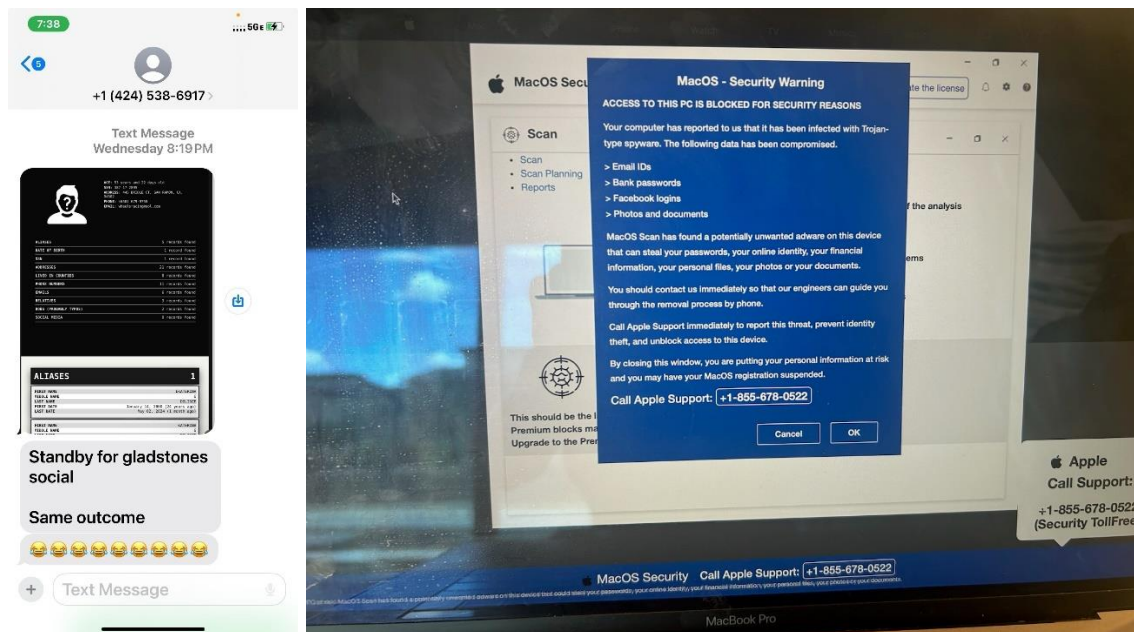
17. K.D. owned a residence located at 11072 Pentland Downs Street, Las Vegas, Nevada that she made available for rent. K.D. contacted M.B., a realtor in Las Vegas, to facilitate a showing of that residence to someone who identified themselves as “Dani.” In February 2024, M.B. met “Dani” and his personal bodyguard at the guard gate for the community. “Dani” provided photo identification for “IDRISS QIBAA.” K.D. rented the property to QIBAA and QIBAA paid rent to K.D. through a wire transfer from a Chase Bank account under the name “UNLOCKED4LIFE LLC” with registered address 1887 Whitney Mesa Drive, Unit 1115, Henderson, Nevada in the amount of \$9,750 monthly.

18. In May 2024, QIBAA sent text messages to K.D. and M.B. to complain about his treatment by the community security guards. QIBAA had not picked up transponders needed to access community’s gates. QIBAA was therefore required to enter through a guard entrance and show identification. QIBAA did not agree with the process and sent racial slurs to K.D. and M.B. The community HOA received constant complaints due to QIBAA and fined K.D. \$5,000.

19. K.D. received a text message from cellular number 424-538-6917 which included K.D.’s personal identifying information such as name, Social Security account number, address, phone number and email address. A message stating, “standby for gladstones” was received from the same telephone number. K.D. also owned a business in California called “Gladstone Clinic.” The business received a large amount of spam emails and phone calls that shut down the company’s ability to operate.

20. M.B. was a realtor for approximately 20 years. Her business social media accounts were hacked, and the user posted sexual posts that negatively affected the ongoing business before the account was shut down. QIBAA was scheduled to vacate the

residence owned by K.D. in July 2024. After the proposed move out date of July 18, 2024, QIBAA stated the air conditioning was not functioning and sent threatening communications to K.D. and M.B. On July 19, 2024, M.B. received a security warning on her Apple computer. Apple support advised M.B. the prompt was fake and likely an attempt to hack the computer.



VICTIM'S 7 and 8

21. On July 1, 2024, C.H. and M.P. contacted the Beverly Hills Police Department to report they had been receiving threatening communications from IDRIS QIBAA, "Unlocked For Life," since October 2023. C.H. hired a private investigator to confirm the identity of QIBAA. QIBAA discovered M.P. was related to a high-ranking American politician and took M.P.'s Instagram page down. QIBBA then contacted M.P. and demanded money to reinstate her account.

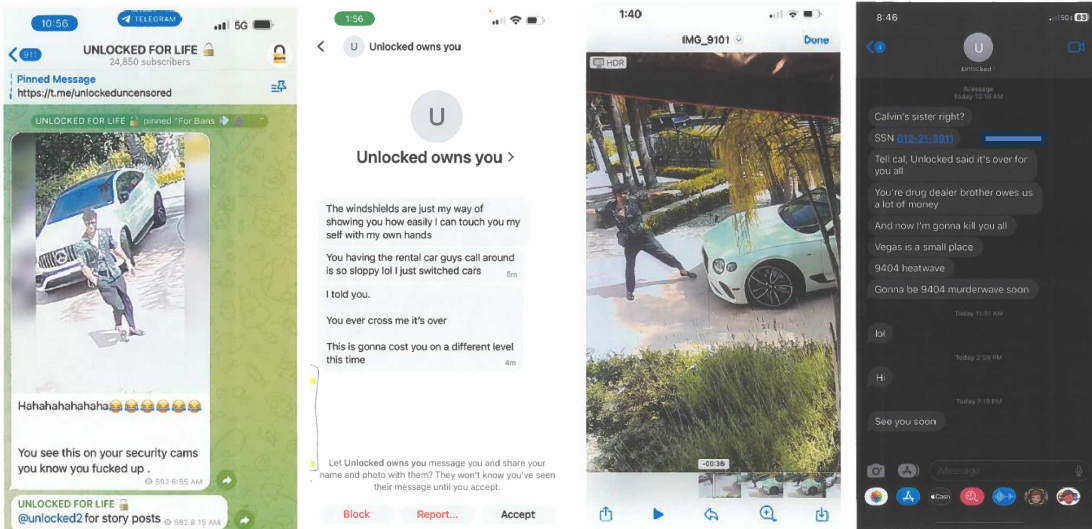
22. C.H. and M.P. did not pay QIBAA any money and started to receive communications which threatened to hurt them and their families if they didn't pay. In

January 2024, C.H. paid QIBAA \$20,000 in Bitcoin because C.H. was in fear for his family's safety.

23. On June 29, 2024, QIBAA showed up at the residence of M.P. and C.H. in Beverly Hills, California. Security camera footage showed QIBAA grabbed a rock from the driveway and smashed the windshield of a white 2022 Bentley and white 2023 Mercedes-Benz parked in the driveway of the residence.

24. M.P. and C.H. reported receiving multiple messages from multiple banks advising them that an unknown person has attempted to open accounts/credit cards under their names.

25. The Telegram account "UNLOCKED FOR LIFE" posted photographs of the residence of M.P. and C.H. as well as personal identifying information to include names, Social Security account numbers, addresses, email address, and phone numbers.



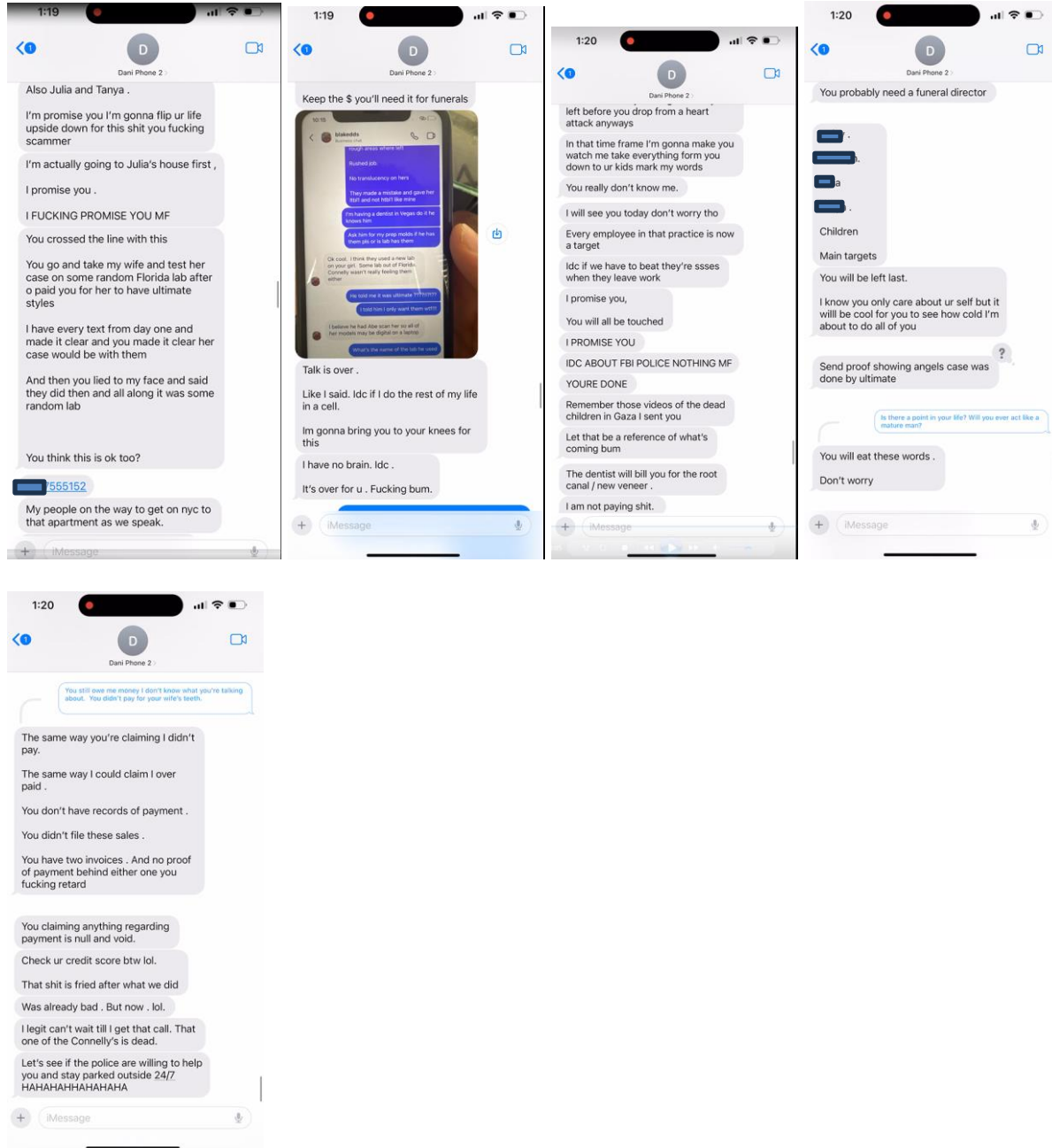
COUNT ONE

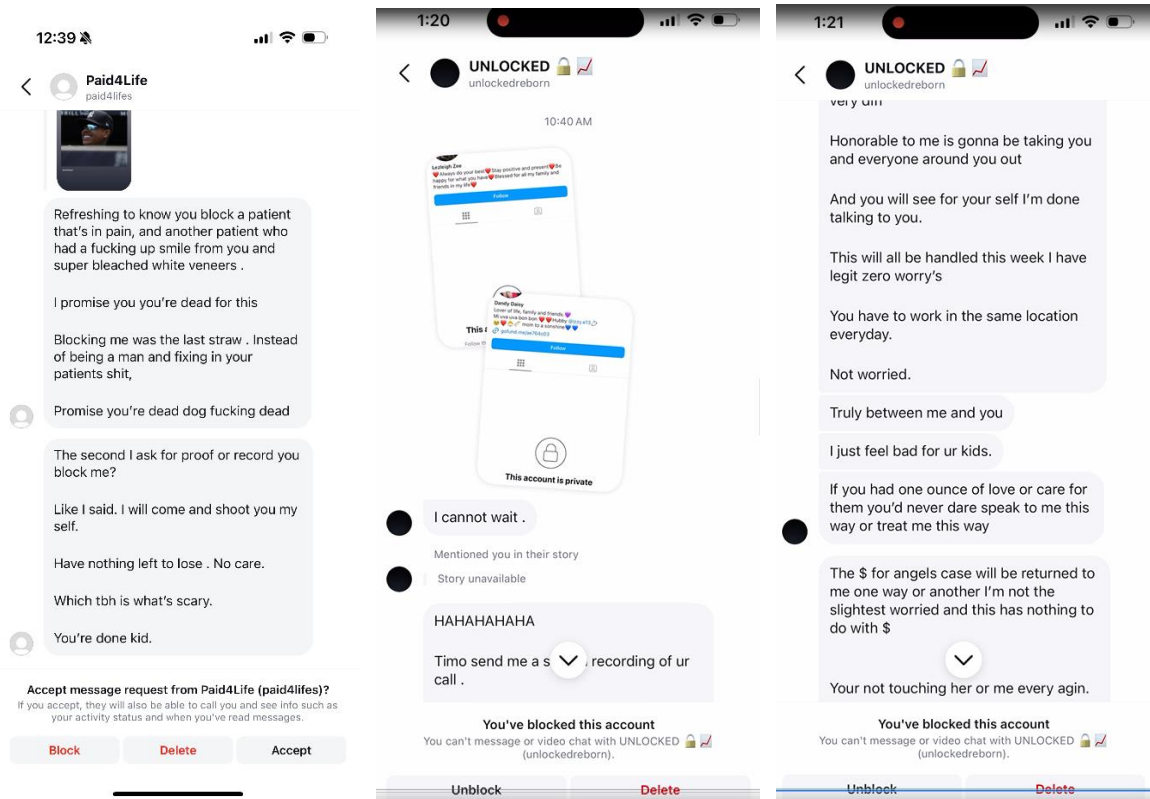
26. T.C., a well-known dentist who owns a practice in Beverly Hills, California treated QIBAA October 2023. The treatments required multiple visits and, on each visit,

1 QIBAA attempted to start a business relationship with T.C. T.C. repeatedly told QIBAA
2 that T.C. was not interested and on several occasions asked QIBAA to stop asking. T.C.
3 stated this upset QIBAA.

4 27. On July 14, 2024, T.C. began to receive a large number of text messages
5 from QIBAA. T.C. received approximately 700 messages that stated QIBAA was upset,
6 and that QIBAA was going to kill T.C. for disrespecting QIBAA.

7 28. On July 19, 2024, T.C. received messages from QIBAA which stated,
8 “you’re dead dog fucking dead,” “I will come and shoot you myself,” “I’m going to bury
9 you for this shit,” “D., L., J., T., Children-Main Targets” which referenced T.C.’s
10 children.
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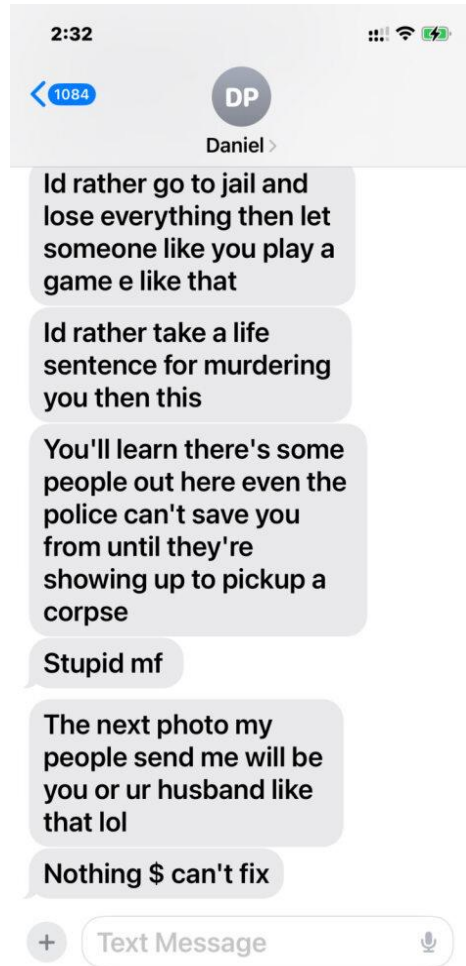


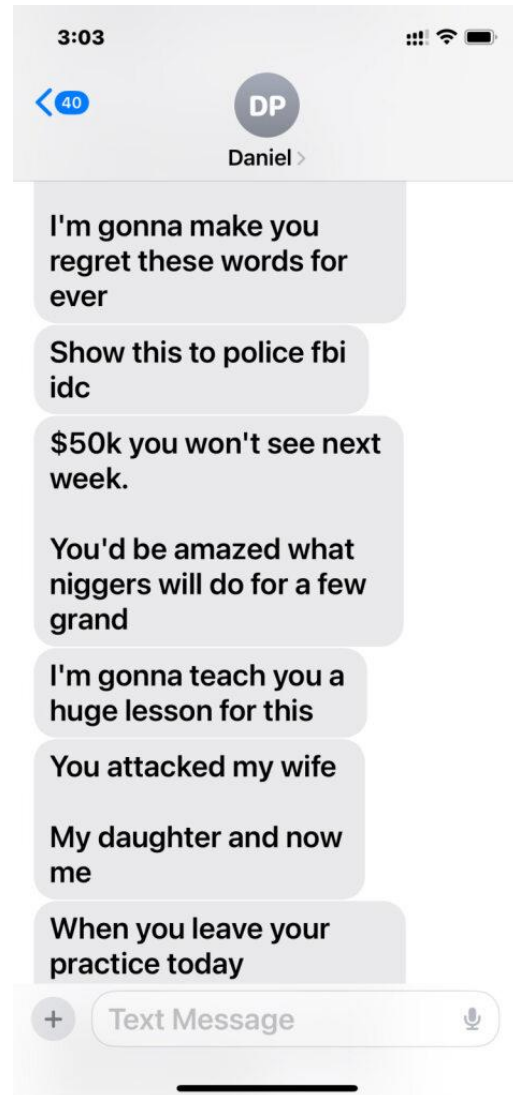
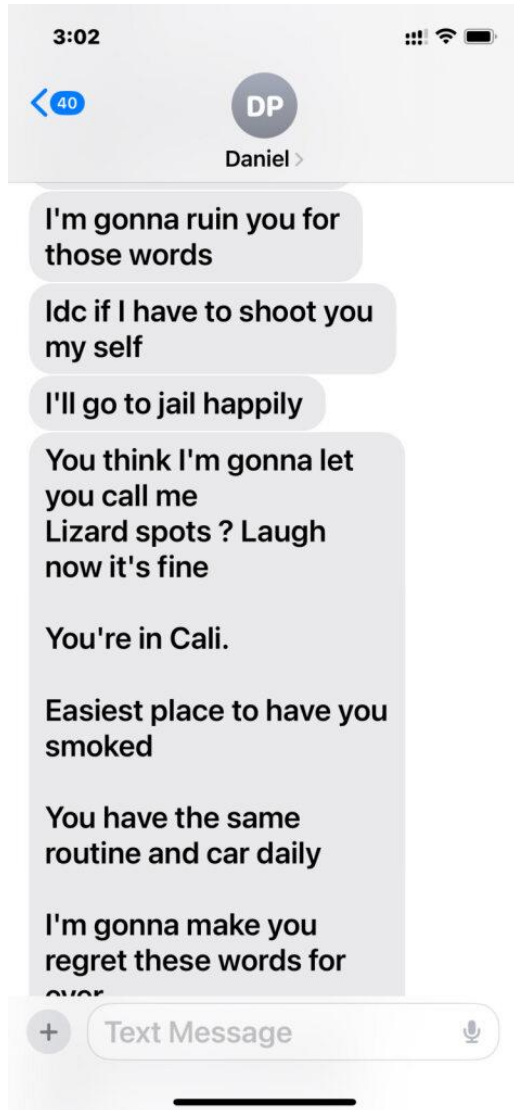


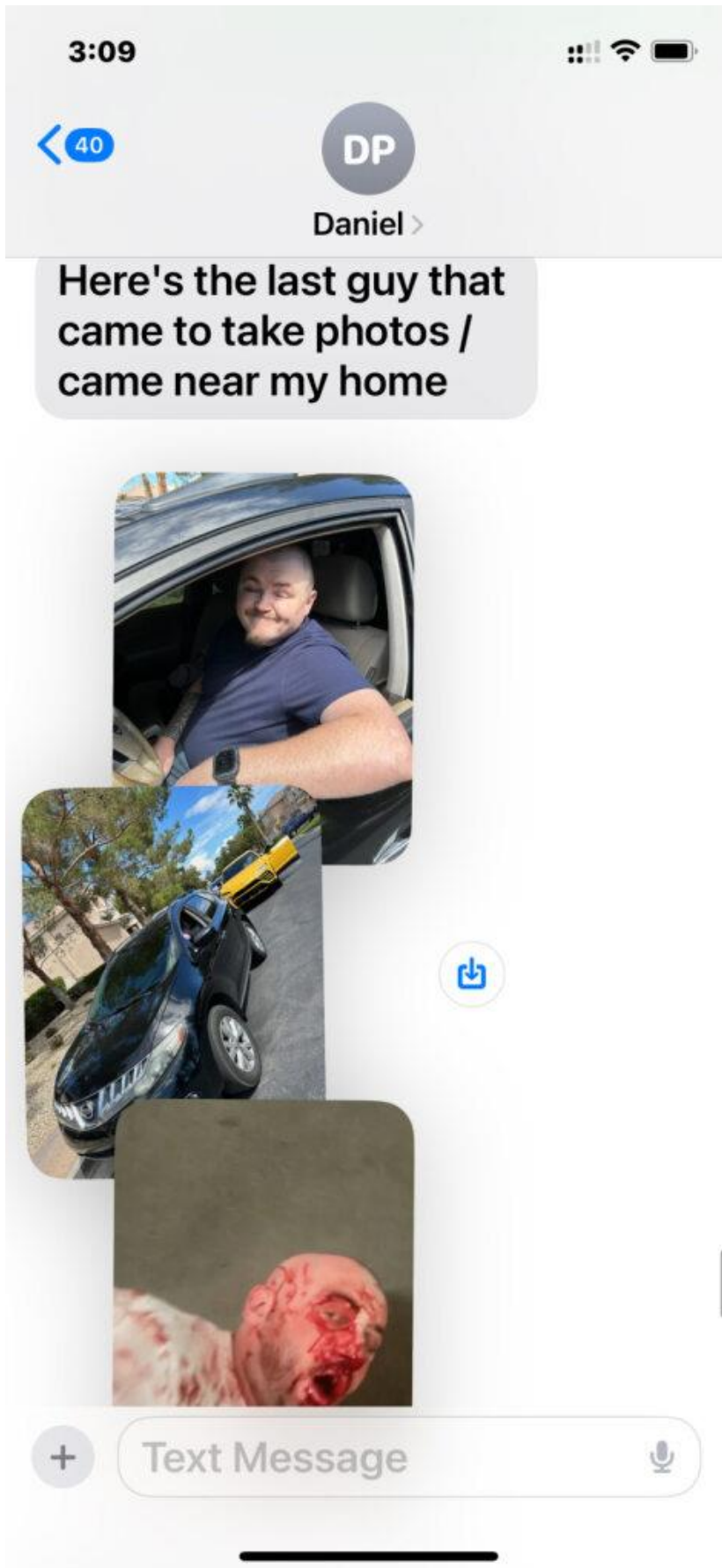
COUNT TWO

29. On July 24, 2024, QIBAA sent more than 70 text messages to K.D and M.B. (See paragraphs 17 – 20 above). As was the case with the messages sent to T.C. related to Count One, QIBAA sent the messages from Nevada and at least one recipient of the messages was in California.

30. The texts, as shown below, threaten injury and death to the recipients and their families.







31. Through training and experience your complainant knows criminals are known to use numerous aliases and alternative means of communication to conceal their identity. QIBAA is known by several victims to go by "Dani." Online, QIBAA is known as aliases along the lines of "Unlocked" or "Unlocked4life" and other derivatives. Through his own admission on the podcast "No Jumper," QIBAA goes by the alias "Unlocked" which relates to his online website unlocked4life.com and numerous social media accounts.

32. Based on the above facts and circumstances, as well as my training and experience, I submit that there is probable cause that Idriss QIBAA, defendant herein, has violated Title 18, United States Code, Section 875(c), Interstate Communications



IAN WENDELBOTH
Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on July 25, 2024.



HONORABLE BRENDA N. WEKSLER
UNITED STATES MAGISTRATE JUDGE

DATED: July 25, 2024